

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street, 10th Floor
New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

Tamara L. Giwa
Executive Director

Jennifer L. Brown
Attorney-in-Charge

January 28, 2025

BY ECF

MENDEORSED
See page 2

The Honorable Richard M. Berman
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: United States v. Bonilla
24 Cr 590 (RMB)**

Dear Judge Berman:

The defense writes to request a bail modification for Mr. Bonilla:

- 1) With the consent of Pretrial, the defense respectfully requests the Court remove the condition of home detention and replace it with a curfew, with hours enforced by Pretrial Services. The Government objects to this condition. Mr. Bonilla has now been compliant with the terms of his release for more than four months, and neither Pretrial nor the defense believe home detention is necessary to ensure the safety of the community or Mr. Bonilla's return to Court.

In the alternative:

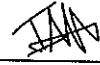
- 2) With the consent of Pretrial and the Government, the defense respectfully requests the Court modify Mr. Bonilla's home detention to allow him to visit his brother, who is currently in the ICU. A detailed description of Mr. Bonilla's brother's condition is attached as Exhibit A. Should the Court grant this request, prior to visiting his brother, Mr. Bonilla will give his pretrial officer at least 48 hours' notice and comply with the hours set by his officer to be at the hospital.

Thank you for the Court's consideration.

United States v. Bonilla, 24 Cr. 590 (RMB)

Page 2 of 2

Respectfully submitted,

/s/ 

Ian Marcus Amelkin
Assistant Federal Defender
52 Duane Street, 10th Floor
New York, NY 10007
(212) 417-8733

cc: AUSA James Madilk, Esq.

<p><u>Court authorizes hospital visits</u> <u>each SATURDAY + SUNDAY between</u> <u>the hours of 2 to 4 P.M.</u> <u>Defense counsel must submit to the</u> <u>Court written authorization from OBH</u> <u>before visitation begins.</u></p> <p>SO ORDERED: Date: <u>1/28/25</u> <u>Richard M. Berman</u> Richard M. Berman, U.S.D.J.</p>
--